

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

GREG ERICKSON, Individually and
derivatively on behalf of CHESAPEAKE
ENERGY CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD
K. DAVIDSON, V. BURNS HARGIS,
FRANK KEATING, BREENE M. KERR,
CHARLES T. MAXWELL, DON
NICKELS, FREDERICK B.
WHITTEMORE, MERRILL A. MILLER,
JR., KATHLEEN M. EISBRENNER, and
LOUIS A. SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY
CORPORATION, an Oklahoma
Corporation,

Nominal Defendant.

Case No. 5:12-cv-631-M

**PLAINTIFF'S MOTION TO EXPEDITE BRIEFING REGARDING
MOTION TO CONSOLIDATE AND APPOINT LEAD COUNSEL**

DEBORAH G. MALLOW IRA SEP
INVESTMENT PLAN, Individually and
derivatively on behalf of CHESAPEAKE
ENERGY CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON L. NICKLES, and LOU SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

Case No. 5:12-cv-436-M

CHRISTOPHER SNYDER, Individually and
derivatively on behalf of CHESAPEAKE
ENERGY CORPORATION

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD
K. DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON L. NICKLES, and LOU SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

Case No. 5:12-cv-437-M

DOLEZAL FAMILY LIMITED
PARTNERSHIP, Derivatively on Behalf
of Nominal Defendant CHESAPEAKE
ENERGY CORP.,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON L. NICKLES, and LOUIS SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORP.,

Nominal Defendant.

Case No. 5:12-cv-477-M

BRIAN F. LEONARD, Individually and
derivatively on behalf of CHESAPEAKE
ENERGY CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON L. NICKLES, and LOUIS SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

Case No. 5:12-cv-479-M

JACOB SHOCHAT, Derivatively and on
Behalf of CHESAPEAKE ENERGY
CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON L. NICKLES, and LOUIS A.
SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,

Nominal Defendant.

Case No. 5:12-cv-488-M

THE DAVID A. KROLL, INC.
EMPLOYEES' PROFIT-SHARING PLAN
AND TRUST, derivatively on behalf of
CHESAPEAKE ENERGY CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD
K. DAVIDSON, V. BURNS HARGIS,
FRANK A. KEATING, BREENE M. KERR,
CHARLES T. MAXWELL, DON L.
NICKLES, FREDERICK B.
WHITTEMORE, MARCUS C. ROWLAND,
MICHAEL A. JOHNSON, LOUIS A.
SIMPSON, KATHLEEN M. EISBRENNER,
and MERRILL A. MILLER, JR.,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,

Nominal Defendant.

Case No. 5:12-cv-493-M

STEPHEN ROBACZYNSKI, Derivatively on
Behalf of Nominal Defendant
CHESAPEAKE ENERGY CORPORATION,

Case No. 5:12-cv-501-M

Plaintiff,

v.

AUBREY K. MCCLENDON, MERRILL A.
MILLER, JR., DON NICKLES, CHARLES
T. MAXWELL, FRANK KEATING,
RICHARD K. DAVIDSON,
V. BURNS HARGIS, KATHLEEN M.
EISBRENNER, LOUIS A. SIMPSON,
BREENE M. KERR, and FREDERICK B.
WHITTEMORE,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

NORMAN SPIEGEL, Derivatively on Behalf
of Nominal Defendant CHESAPEAKE
ENERGY CORPORATION,

Case No. 5:12-cv-502-M

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON NICKLES, and LOU SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,

Nominal Defendant.

HOWARD ROSENGARTEN, Derivatively
on Behalf of CHESAPEAKE ENERGY
CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON NICKLES, and LOU SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,

Nominal Defendant.

Case No. 5:12-cv-505-M

ARTHUR ALBERTS, Individually and
derivatively on Behalf of CHESAPEAKE
ENERGY CORPORATION,

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. MILLER, JR.,
DON L. NICKLES, and LOU SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

Case No. 5:12-cv-545-M

JOEL GERBER, Derivatively on Behalf of
CHESAPEAKE ENERGY CORPORATION,

Case No. 5:12-cv-584-D

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, KATHLEEN M.
EISBRENNER, V. BURNS HARGIS,
FRANK KEATING, CHARLES T.
MAXWELL, MERRILL A. "PETE"
MILLER, JR., DON L. NICKLES, LOU
SIMPSON, BREENE M. KERR and
FREDERICK B. WHITEMORE,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

GREG ERICKSON, Individually and
derivatively on behalf of CHESAPEAKE
ENERGY CORPORATION,

Case No. 5:12-cv-631-M

Plaintiff,

v.

AUBREY K. MCCLENDON, RICHARD K.
DAVIDSON, V. BURNS HARGIS, FRANK
KEATING, BREENE M. KERR, CHARLES
T. MAXWELL, DON NICKELS,
FREDERICK B. WHITEMORE, MERRILL
A. MILLER, JR., KATHLEEN M.
EISBRENNER, and LOUIS A. SIMPSON,

Defendants,

and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma Corporation,

Nominal Defendant.

Plaintiff Greg Erickson ("Plaintiff"), pursuant to LCvR7.1(g), respectfully moves the Court for an order shortening the time for responses to Plaintiff's Motion to Consolidate and Appoint Lead Counsel, which is being filed concurrently herewith.

As described more fully in Plaintiff's Motion to Consolidate and Appoint Lead Counsel, Plaintiff seeks to consolidate the related 2012 Derivative Actions and to appoint lead counsel in the consolidated action. Plaintiff, through this motion, seeks to shorten the time for responses because the issues presented in Plaintiffs' Motion to Consolidate and Appoint Lead Counsel have already been argued exhaustively in briefing filed in connection with the previously-filed competing motions to consolidate and appoint counsel, and therefore providing a response within five days is reasonable. Conversely, allowing a full twenty-one days to respond is unnecessary and unreasonable.

Therefore, Plaintiffs respectfully request the Court require any party wishing to file a response to the Motion to Consolidate and Appoint Lead Counsel to do so on or before Tuesday, July 3, 2012.

DATED: June 27, 2012

DERRYBERRY & NAIFEH, LLP

s/ Darren Derryberry

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Proposed Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. I further certify that I served the attached document by U.S. Mail and electronic mail (where address was available) on the following:

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s/ Darren Derryberry
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